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DIVISION OF WILDLIFE RESOURCES

EQUAL OPPORTUNITY EMPLOYER

DOUGLAS F. DAY
Director

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JIM

MAY 12 1982

May 6, 1982

Mr. Cleon B. Feight, Director
Division of Oil, Gas and Mining
State Office Building
Salt Lake City, Utah 84114

Attention: James Smith

Dear Jack:

The Division has reviewed the Mining and Reclamation Plan (MRP) proposed by Natomas Trail Mountain Coal Company for the Trail Mountain Mine, and our comments are attached.

The Division provided the Company with detailed wildlife information and a recommended wildlife mitigation plan on May 22, 1981. Some of this information has been erroneously incorporated into the MRP. Some of the errors are without significance, such as numbers of various classes of wildlife that inhabit the mine plan area. However, some errors are of considerable significance, such as failure to properly rank the relative value of wildlife habitats and use areas. In any event, it is reasonable to expect that the MRP should be made to be technically correct.

Thank you for an opportunity to review the MRP.

Sincerely,

Douglas F. Day
Douglas F. Day
Director

Enclosure

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DIVISION OF
OIL, GAS & MINING

UTAH DIVISION OF WILDLIFE RESOURCES' REVIEW COMMENTS
ON THE MINING AND RECLAMATION PLAN (MRP) PROPOSED BY
NATOMAS TRAIL MOUNTAIN COAL COMPANY FOR THE TRAIL
MOUNTAIN MINE

Volume I

Page 3-28, 3.4.1.1: Although it is reasonable to suspect that some wildlife have adapted to the mining operation, unquestionably there are species that inhabit the area that will not habituate or adapt to the mine. When considering the 5.5 acres of disturbed area, some species have been displaced or lost. The statement in the MRP on page 3-28, 3.4.1.1 that "wildlife. . .have adapted to the mining operation" is misleading, erroneous and in conflict with statements made in the MRP on page 10-39, 10.4, paragraph 2 and on page 3-44. The later two sections (pages 3-44 and 10-39) properly identifies the situation as it relates to impacts on wildlife. Thus, page 3-28 needs to be corrected.

Page 3-47 through 3-49: See comments provided for page 10-6. It is also valuable to note that impacts of some level have likely been experienced by a multitude of animal species over the years of mine operation. Many of the "0" values identified by the MRP between pages 10-42 and 10-60 are not really "no impact" but rather low levels of impacts.

Page 3-51: Same comments provided for page 10-62.

Volume II

Page 10-6, paragraph 1: The numerical rating system for perturbation evaluation is not an objective procedure. It is subjective and only represents the cumulative opinions of the biological team and management personnel. The system does not define reasons for selecting any of the levels of perturbation. There is also a lack of identification of the biologists and management personnel involved in the ranking decisions. Such a ranking technique is suspect considering the lack of definition, procedural guidance and identification of participants. Such a technique would be satisfactory if there were definitions and guidelines to direct a user as to which level (0-10) to select for various impacts.

Page 10-7, 10.3: The mine plan area as assessed by the Division provides potential habitat for six species of amphibians, seventeen species of reptiles, one hundred-forty species of birds and seventy-four species of mammals. The MRP reports the potential as being for 2 amphibian, 12 reptile, 121 avian and 52 mammalian species.

Page 10-7, 10.3.1: The MRP fails to acknowledge the presence of the riparian habitat type along Cottonwood Creek. This habitat type is ranked as being of critical value to the area's wildlife.

Page 10-9, 10.3.2.1: The stream habitat, which would include the flow of water as well as the riparian vegetation and stream channel sediments, is unquestionably of critical value to Cottonwood Creek's aquatic resource. The MRP erroneously states that the stream habitat is only of high-priority value.

Page 10-9, 10.3.2.2: The MRP does not discuss density of any terrestrial wildlife species. Density relates to a quantity of animals per unit area or length of area sampled. The MRP does identify relative abundance in Table 10-3 through 10-5. Relative abundance is best described as the relative degree of plentifulness of a species. Thus this portion of the MRP needs to be corrected from a discussion of density to one of relative abundance.

Page 10-42 through 10-60 and Table 10-9: See comments provided for page 10-6.

Page 10-62, paragraph 2: Since the MRP acknowledges the value of educating mine employees concerning wildlife (page 3-45 and 10-41) and commits the mine to such training (page 3-51 and 10-62), it is recommended that the existing "Coal Mining and Wildlife" training film be implemented as part of the mine's training program. The mine has been made aware of the availability of the training film. Encouragement by UDOGM could cause an affirmative reaction by the mine.